

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,)
)
V.) Case No. 3:09-00218
) Chief Judge Haynes
VAZGEN FAKHOORIAN.)

SECOND MOTION TO EXTEND PLEA DEADLINE

Comes now the Defendant, Vazgen Fakhoorian, by and through counsel, and would move the Court for an extension of the plea deadline in this case from the current deadline of Monday, May 20, 2013 until Monday, June 10, 2013.

We would submit that plea negotiations are still ongoing and that a proposed plea agreement will be worked out in the case. However, due to language barriers in both meeting with Mr. Fakhoorian as well as the need to translate any plea agreement into Farsi counsel would submit that the existing deadline would not provide enough time.

Counsel has communicated with the United States Attorney's Office concerning this Motion for an extension of time and they have expressed no opposition.

Therefore, Counsel would respectfully move the Court to extend the plea deadline for Vazgen Fakhoorian until Monday, June 10, 2013 at a time convenient with the Court's docket.

*On motion
of Counsel. The hearing is
reset for Monday June 10, 2013
at 11:00am
June 10, 2013*